City of Lansing MS4 NPDES Application Attachment E

Construction Stormwater Runoff Control Program

Response to Application Question #29

Consistent with the City of Lansing's designation as a Part 91 Agency, the City developed a standard operating procedure for its soil erosion and sedimentation control program. This procedure is included herein with these application materials as Attachment D. As indicated in the City's SESC procedure (page 4 of Attachment D), the City's Public Service Dept. employs an inspector for purposes of tracking field compliance with SESC program requirements. This inspector will generally track and enforce compliance with SESC requirements through use of the "Inspection Field Report"; a copy of which is included with Attachment D.

Response to Application Question #30

Some "smaller" releases of soil or sediment to the MS4 can be addressed through use of Operations & Maintenance Division resources to clean out the affected "downstream" catch basin sump. It should be noted that the City standard is for a minimum 3 foot catch basin sump, which is instrumental in catching quantities of sediment before reaching the downstream storm sewer.

As indicated above, the City's SESC inspector would accordingly enforce correction of the violation from private property. If it's determined that the quantity of soil or sediment is at levels of concern and could not be contained in the downstream catch basin sump, the City's inspector will notify Engineering Division staff who would accordingly use the process for DEQ notification consistent with any other "illicit" discharge (see description of IDEP notification procedures in Attachment B and Attachment C).

Response to Application Question #31

The City's site plan review process assures that the designers of applicable sites submit an approvable SESC plan with their overall site plan submittal. Guidance materials for site plan submittal (intended for "external customers", such as developers and design engineers) that are issued by the City's Planning Office include requirements for submittal of an approvable SESC plan. More importantly, the Public Service Dept. staff who are responsible for review of site plans are required to utilize the City's "Site Plan Review Checklist" when performing any site plan review and this checklist requires that all provisions of the SESC program be met for an approvable SESC plan. This process assures that the site design includes an approvable SESC plan. Subsequent to approval, the City has "checks" in place with the Dept. of Public Service-Permits Office to assure that the developer secures all applicable permits from the City for the approved site plan, including the SESC permit for the site.

A copy of Public Service Dept.'s staff "Site Plan Review Checklist" is included for information with Attachment E.

Response to Application Question #32

The City's has prepared a standard correspondence to "All Contractors, Developers, Architects, and Engineers" with specific instructions for application submittals for SESC permitting. A copy of this correspondence is included for information with Attachment E.

Although this letter is dated January 16, 2013, the Dept. of Public Service has been issuing essentially the same correspondence for several years (the language was recently improved). The important thing to note is that page 2 of this correspondence informs the applicant of their responsibility under Michigan law/rule to obtain State of Michigan Permit by Rule coverage where applicable. Of note, the City is currently looking to find an appropriate location for posting this correspondence to the Public Service Dept. website (this is expected to be available on the site in early February, '13).